



DLA Piper LLP (US)
650 S. Exeter Street
Suite 1100
Baltimore, MD 21202
www.dlapiper.com

Ellen E. Dew

December 4, 2023

VIA CMECF

Catherine M. Stavlas
Clerk of Court
United States District Court for the District of Maryland
101 West Lombard Street
Baltimore, MD 21201

**Re: *Schulze v. Sanofi US Services, Inc., et al.*, 23-cv-03209-SAG
Stowe v. Sanofi US Services, Inc., et al., 23-cv-3152-SAG
Taswell v. Sanofi US Services, Inc., et al., 23-cv-3181-SAG**

Dear Madam Clerk:

On October 4, 2016, the Judicial Panel on Multidistrict Litigation ordered that 28 filed civil actions all shared common questions and directed the actions to the Eastern District of Louisiana for coordinated or consolidated pretrial proceedings pursuant to 28 U.S.C. § 1407. *See In re: Taxotere (Docetaxel) Products Liability Litigation*, MDL No. 2740 (the “Taxotere MDL”). Since that time, more than 15,000 lawsuits were filed or transferred into the Taxotere MDL, including the three captioned cases above. On October 23, 2023, Judge Jane Triche Milazzo ordered that the second wave of the Taxotere MDL cases should be transferred back to the United States District Courts, finding that the purposes behind consolidation had been served. Maryland has previously received six cases remanded out of the Taxotere MDL, which this Court has designated as related.¹ Between November 15 and November 20, the three cases referenced above were remanded out of the Taxotere MDL to this Court for further proceedings.

Plaintiffs in the MDL sued several pharmaceutical companies that manufactured and/or distributed a chemotherapy drug, Taxotere or docetaxel. Each of the three cases remanded involve claims against Defendants Sanofi-aventis U.S. LLC and Sanofi U.S. Services, Inc. General company liability discovery has been completed as part of the MDL proceeding. Plaintiff case-specific discovery is ongoing in these three cases. For the same reasons that Defendants articulated regarding the first six remanded cases, all three of these cases have been remanded from the

¹ *See Vinson v. Sanofi US Services, Inc. et al.*, 23-cv-2083-SAG; *Pegues v. Sanofi US Services, Inc. et al.*, 23-cv-2084-SAG; *Horst v. Sanofi US Services, Inc. et al.*, 23-cv-2085-SAG; *Davis v. Sanofi US Services, Inc. et al.*, 23-cv-2086-SAG; *Conway v. Sanofi US Services, Inc. et al.*, 23-cv-2087-SAG; *Knox v. Sanofi US Services, Inc. et al.*, 23-cv-2088-SAG. Defendants also file letters regarding relatedness dated November 13, 2023 and November 21, 2023 respectively, regarding the previously opened cases in Maryland in this second wave of remanded cases. As stated in that letter, those letters, this letter addresses the final round of open cases from Judge Milazzo’s second wave of cases of the Taxotere MDL.



Catherine M. Stavlas
December 4, 2023
Page Two

Taxotere MDL and Defendants believe that all the cases remanded out of the Taxotere MDL should be designated as related in the interests of judicial economy and facilitating the efficient use of Court resources.

As required by Local Rule 103.1(b), through this letter, we are notifying the Clerk of Court and all parties of our request that the cases be designated as related. As the remainder of the second wave of remanded cases are opened in the District of Maryland, Defendants intend to designate them as related, as well.

Thank you for your attention to this matter and please do not hesitate to contact me with any questions that you may have regarding this notification.

Very Truly Yours,

A handwritten signature in blue ink, appearing to read 'Ellen E. Dew'.

Ellen E. Dew

cc: All counsel/parties